

THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Alejandro Franco Tovar, : Chapter 13  
Debtor : Bankruptcy No.: 21-10139-elf  
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**Hearing to be Held:**

**Date:** February 11, 2021

**Time:** 4:00pm

**Place:** United States Bankruptcy Court  
Eastern District of Pennsylvania  
Courtroom #1  
Robert N.C. Nix, Sr. Federal Courthouse  
900 Market Street  
Philadelphia, PA 19107

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Pursuant to Standing Order M-20-3003, the above-scheduled hearing is telephonic due to COVID mitigation efforts. Parties shall call (877) 336-1828 and use Access Code 1229352.

**NOTICE OF EXPEDITED MOTION AND HEARING DATE**

Alejandro Franco Tovar, Movant, by and through counsel of the Ross, Quinn & Ploppert, P.C., has filed a motion to sell real estate known as 396 East Anglesey Terrace, West Chester, Pennsylvania 19380, and to pay real estate broker commissions and customary closing costs within the current Chapter 13 bankruptcy.

**YOUR RIGHTS MAY BE AFFECTED. YOU SHOULD READ THESE PAPERS CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE IN THIS BANKRUPTCY CASE. (IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT AN ATTORNEY.)**

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then written objections or other responsive pleadings to the Motion (**while not required**) may be filed up to the time of the hearing and will be considered at the time of the hearing. You or your attorney may do ALL of the following:

- (a). file an answer explaining your position at

United States Bankruptcy Court  
Eastern District of Pennsylvania  
Robert N.C. Nix, Sr. Federal Courthouse  
900 Market Street, Suite 400  
Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you should mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to attorney for movant:

Joseph Quinn, Esquire  
ROSS, QUINN & PLOPPERT, P.C.  
192 S. Hanover Street, Suite 101  
Pottstown, PA 19464

2. A hearing on the motion is scheduled to be held before the Honorable Eric L. Frank, United States Bankruptcy Judge, on February 11, 2021 at 4:00pm\* in:

United States Bankruptcy Court  
Eastern District of PA - Philadelphia Division  
Courtroom #1  
Robert N.C. Nix, Sr. Federal Courthouse  
900 Market Street  
Philadelphia, PA 19107

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3. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you are on the Clerk's Service List and you request a copy from the attorney named in paragraph 1(b).

4. You may contact the bankruptcy clerk's office at 215-408-2800 to find out whether the hearing has been cancelled because no one filed an answer.

**ROSS, QUINN & PLOPPERT, P.C.**

By: /s/ Joseph Quinn  
Joseph Quinn, Esquire  
Attorney I.D. No. 307467  
192 S. Hanover Street, Suite 101  
Pottstown, PA 19464  
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JQuinn@rqplaw.com  
Counsel for Debtor

Date: February 9, 2021